

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

GREATGIGZ SOLUTIONS, LLC,

§

Plaintiff

§

v.

Case No. 6:20-cv-0000764

DOORDASH, INC.

§

JURY TRIAL DEMANDED

Defendant

**DEFENDANT'S AGREED MOTION TO STAY ALL DEADLINES PENDING  
SETTLEMENT**

Defendant DoorDash, Inc. (“Defendant”) and Plaintiff GreatGigz Solutions, LLC’s (“Plaintiff”) have reached a settlement agreement. The parties respectfully request all deadlines be stayed for 21 days to allow for certain actions to be taken pursuant to the settlement agreement, which will then result in a dismissal of this case. This motion is not made for delay, but only to permit orderly resolution.

Counsel for Defendant has conferred with counsel for Plaintiff, and the parties agree to the relief requested in this motion

Dated: January 4, 2021

Respectfully submitted,

By: /s/ Rex A. Mann  
Rex A. Mann  
Texas Bar No. 24075509  
WINSTON & STRAWN LLP  
2121 N. Pearl St., Suite 900  
Dallas, Texas 75201  
Telephone: (214) 453-6500  
Fax No.: (214) 453-6400  
[rman@winston.com](mailto:rman@winston.com)

Kathi Vidal (*Admitted Pro Hac Vice*)  
California Bar No. 194971  
WINSTON & STRAWN LLP  
275 Middlefield Road Suite 205  
Menlo Park, California 94025  
Telephone: (650) 858-6500  
Fax No.: (650) 858-6550  
[kvidal@winston.com](mailto:kvidal@winston.com)

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on January 4, 2021, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Rex A. Mann  
Rex A. Mann